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FILED

SEP 26 2022 BG

U.S. BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA

6 *Pro Se Fire Victim Claimant and Party to related proceedings before the California Public Utilities
7 Commission and the California Office of Energy Infrastructure Safety*

9 **UNITED STATES BANKRUPTCY COURT**
10 **NORTHERN DISTRICT OF CALIFORNIA**
11 **SAN FRANCISCO DIVISION**

12
13 In re:

14 PG&E CORPORATION,

15 -and-

16
17 PACIFIC GAS AND ELECTRIC
18 COMPANY,

19 Debtors.

- 20 ☐ Affects PG&E Corporation
21 ☐ Affects Pacific Gas and Electric Company
22 ☒ Affects both Debtors

23 * *All papers shall be filed in the lead case,*
24 *No. 19-30088 (DM)*

Bankr. Case No. 19-30088 (DM)
Chapter 11
(Lead Case)
(Jointly Administrated)

**SUPPLEMENTAL STATEMENT AND
NOTICE IN SUPPORT OF THE
MOTION OF WILLIAM B. ABRAMS
PURSUANT TO FEDERAL RULE OF
BANKRUPTCY PROCEDURE 2004
FOR ENTRY OF AN ORDER
AUTHORIZING DISCOVERY AND
HEARINGS REGARDING DEBTORS
ACTS, CONDUCT AND
AGREEMENTS THAT MAY
OBSTRUCT OR LIMIT THE JUST
AND FAIR MANAGEMENT OF THE
FIRE VICTIM TRUST**

Related to: Dkt. 12995, 12996

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1 Additionally, Abrams wants to bring to the Court's attention that PG&E Corporation and
2 Pacific Gas and Electric Company (the "**Debtor**" or "**Debtors**") have secured additional protections
3 from Bankruptcy Rule 2004 discovery through the "*Motion for Entry of Protective Order Pursuant to*
4 *Fed. R. Bankr. P. 7026 and 9014(c) and 11 U.S.C. § 105(a) Governing Discovery Materials and*
5 *Other Information*" [Dkt. 2459] which was later approved by the Court on August, 6, 2019 through
6 the "*Confidentiality and Protective Order*" [Dkt. 3405] (the "**Protective Order**"). As a pro se
7 claimant, Abrams was unaware of these Court ordered protections when the Motion was initially
8 filed. Within this Order the following added protections were provided for the Debtors:

- 9 1) "*Discovery Material produced informally by the Debtors in connection with the*
10 *Chapter 11 Cases or pursuant to Rule 2004 (unless otherwise agreed by the Debtors)*
11 *may be used in the Chapter 11 Cases, including in connection with any contested*
12 *motions in the Chapter 11 Cases, and may not be used in connection with any*
13 *adversary proceeding or other litigation.*" (emphasis added)
- 14 2) "*Where this Order is in conflict with any existing confidentiality agreements,*
15 *intercreditor agreements, Committee Bylaws, non-disclosure agreements, protective*
16 *orders or similar agreements applicable to any Producing Party and/or Receiving*
17 *Party in connection with the Cases, the provisions that provides the most*
18 *confidentiality protection for Discovery Materials applies.*" (emphasis added)
- 19 3) "*Nothing herein shall prevent or otherwise restrict a Receiving Party from notifying,*
20 *confidentially and in good faith, law enforcement or regulatory personnel of a*
21 *governmental unit of a potential violation of law revealed by the Discovery Material.*"
- 22 4) "*Even after Debtors' emergence from Bankruptcy, the confidentiality obligations*
23 *imposed by this Order shall remain in effect until a Designating Party agrees*
24 *otherwise in writing or a Court order otherwise directs.*" (emphasis added)
- 25 5) Section 6.2 "Meet and Confer" – "*The Challenging Party shall initiate the dispute*
26 *resolution process by providing written notice of each designation it is challenging*
27 *and describing the basis for each challenge. To avoid ambiguity as to whether a*
28 *challenge has been made, the written notice must recite that the challenge to*
 confidentiality is being made in accordance with this specific paragraph of the Order.

1 ***Within five (5) business days of the date of service of the notice challenging the***
2 ***designation, the Parties shall attempt to resolve each challenge in good faith and***
3 ***must begin the process by conferring directly.*** (emphasis added)

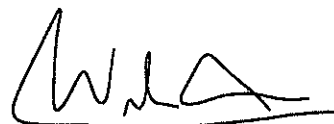
4 Given these terms and in accordance with Section 6 of this Protective Order, Abrams provides
5 this required notice and states his intent to meet and confer in good-faith with the Debtors to advocate
6 for the expedient release of agreements and other relevant information to provide greater
7 transparency regarding the Debtors' acts and conduct that may interfere and/or otherwise impede (1)
8 the value of the Fire Victim Trust (2) the actions of the Trustee, TOC and other attorneys
9 representing the interests of victims and (3) the fair and just settlements of PG&E Fire Victims.
10 Furthermore, if after efforts to meet and confer are concluded, remedies to these issues of
11 transparency and discovery are not agreed upon by parties, Abrams states his intent and reserves his
12 rights in accordance with Section 6.3 of this Protective Order which states as follows:

13 *"If the Parties cannot resolve a challenge without court intervention and if either the Challenging*
14 *Party or the Designating Party wishes to then seek Court intervention, both the Challenging*
15 *Party and Designating Party shall submit a joint letter or motion to the Court, reflecting each*
16 *party's position, describing adherence to paragraph 6.2's "meet and confer" requirement, and*
17 *attaching any relevant information (including documents or declarations), within ten (10)*
18 *business days after the conclusion of efforts to meet and confer and the indication in writing*
19 *either the Challenging Party or the Designating Party of its intent to seek court intervention."*

20 Abrams hopes that through this discovery process, sunlight will shine on "good faith" "acts" and
21 "conduct." However, if through this discovery process, we discover "bad faith" or unreasonable acts
22 and conduct, it is my hope that parties will come together to remedy these issues central to just and
23 fair settlements for victims.

24 Executed on September 24, 2022, at Santa Rosa, CA.

25 Respectfully submitted,

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27 _____
28 William B. Abrams
 Pro Se Claimant